

## Privacy Policy – February 2023

Cadence Investment Partners LLP (“Cadence”) is committed to protecting the privacy of its clients and any individual who has shared personal data with the Firm. If you have any queries on this policy please contact Stewart Higgins at [stewart@cadenceinvestment.com](mailto:stewart@cadenceinvestment.com) . We do not have a Data Protection Officer.

This document sets out Cadence’s Data Protection and Privacy Policy (the "Policy") and the manner in which Cadence collects, uses and stores personal data and information submitted to it by you.

### General Data Protection Regulation

Cadence complies with any applicable responsibilities under the United Kingdom’s Data Protection act 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) and the Privacy and Electronic Communications Regulation 2003, collectively termed “Data Protection Laws”. Cadence maintains registration with the Information Commissioners Office (“ICO”).

### Scope of this document

This Privacy Notice is directed at all natural persons whose Personal Data we collect other than our employees.

Cadence is a Controller in relation to all Personal Data which we collect. Any personal data you provide to Cadence will be treated and kept in confidence. While it may be shared within the Cadence firm, it will not be provided to any third parties.

### How we collect personal data

We collect data in the following main ways:

In emails and hard copy correspondence sent to us

Through notetaking during telephone calls

In paper correspondence

Directly from our clients

Information in the public domain

We do not purchase databases of personal data from third parties.

Cadence is fully registered with the Information commissioner’s office under the GDPR and aims to comply with it in all its dealings with your personal data, including using its reasonable endeavours to ensure that such data is accurate, kept up to date and is not held for longer than necessary. Further information on the Act is located at [www.ico.org.uk](http://www.ico.org.uk).

### Categories of data subject

Cadence collects Personal Data in relation to the following main categories of Data Subject:

Our clients, where our client is an individual.

In the vast majority of cases our client is an organisation and we hold contact details of individuals at the organisation.

## **Types of Personal Data held**

We store the following types of Personal Data:

Names

Address, email and contact telephone numbers. These may be personal or business depending on whether the client is an individual or a representative of an organisation.

We hold or process no other form of personal data.

## **Our Personal Data Retention Policy**

We hold client contact details for 7 years from the last point of contact.

## **Recipients of Personal Data**

We transfer personal data to:

Service providers based in the UK, Europe and the USA who provide cloud computing services.

Where appropriate, our auditors and professional advisors (including lawyers, insurance companies and bankers).

We may also disclose personal data where we are under a legal or regulatory duty to do so. This may include the exchange of information with companies or organisations for the purposes of fraud protection.

## **Transfers outside of the UK**

We use cloud data storage solutions and data may be held outside of the UK. Whenever we transfer your personal data outside of the UK, we ensure similar levels of protection are afforded to it as would occur within the UK. Data transfers will typically be to EEA countries or to the United States of America.

## **Your Legal Rights**

You have the right to:

Request access to your personal data.

Request correction of the personal data that we hold about you.

Request deletion of your personal data. We will comply unless there are specific legal reasons why we must hold your data. These reasons will be notified to you at the time of your request.

Request transfer of your personal data to you or a third party.

Withdraw consent at any time where we are relying on your consent to process your personal data. We will advise you of any consequences with regard to the services we provide this may cause at the time of withdrawal.

## **Cookies**

Our website uses one cookie for the purpose of compiling visit statistics. We do not track individual visitors to our website and the cookie expires when your browsing session ends.